

1 JEROME R. BOWEN, ESQ.
Nevada Bar No. 4540
2 **BOWEN LAW OFFICES**
9960 W. Cheyenne Ave., Suite 250
3 Las Vegas, Nevada 89129
Telephone: (702) 240-5191
4 Facsimile: (702) 240-5797
twilcox@lvlawfirm.com
5 *ATTORNEYS FOR PLAINTIFF*

6
7 **UNITED STATES DISTRICT COURT**

8 **DISTRICT OF NEVADA**

9 * * *

10 WILLIE WORTHAMS, individually;

11 Plaintiffs,

12 vs.

13 GEICO CHOICE INSURANCE COMPANY,
a foreign entity; LEWIS BRISBOIS
14 BISGAARD & SMITH, LLP, a foreign
limited liability partnership; LEWIS ROCA
15 ROTHGERBER, CHRISTIE, LLP, a foreign
limited liability partnership; DOES I through
16 X, inclusive; and ROE CORPORATIONS I
through V, inclusive,

17 Defendants,
18
19

Case No. 2:24-cv-00023-RFB-NJK

20
21 **STIPULATION TO EXTEND TIME TO**
FILE REPLY IN SUPPORT OF
PLAINTIFF'S MOTION FOR
PROTECTIVE ORDER [ECF. 91] and
MOTION TO COMPEL [ECF. 92]

(1st Request)

22 Pursuant to LR IA 6-1, Plaintiff Willie Worthams and Defendant GEICO Choice Insurance
23 Company ("GEICO"), by and through their counsel of record, hereby submit to this Honorable
24 Court this stipulation and request to extend the time by **five (5) days** for Plaintiff to file his replies
25 in support of *Plaintiff's Motion for Protective Order against Defendant GEICO Choice Insurance*
Company's Notices to take Depositions of Jerome "Jerry" J. Konell, Sharithea Everett, and Willie
26 *Worthams* (ECF 91) and *Plaintiff's Motion to Compel Responses to Specific FRCP 34 Request for*
Production and Disclosure of Documents Claimed Privileged from FRCP 26 Disclosures (ECF 92)
27 The current due date for Plaintiff's replies is January 9, 2025 for both motions. The proposed new

BOWEN LAW OFFICES
Conquistador Plaza
9960 W. Cheyenne Ave., Suite 250
Las Vegas, Nevada 89129
702-240-5191 FAX: 702-240-5797

1 due date is January 14, 2025. The parties respectfully submit that good cause exist for this stipulation
2 based on the following:

3 1. Counsel for Plaintiff has been traveling for out-of-state depositions, including one in the
4 instant matter, and the due date overlaps with scheduled depositions and travel accommodations.
5 This requested extension alleviates any conflicts.

6 2. The Parties have agreed to stipulate to this extension.

7 3. This request is made in good faith and without intent to cause undue delay.

8 4. In accordance with LR IA 6-1, this is the first request for an extension of time to file
9 replies in support of Plaintiff's Motion for Protective Order (ECF 91) and Plaintiff's Motion to
10 Compel (ECF 92).

11 DATED this 9th day of January, 2025.

12 **BOWEN LAW OFFICES**

13
14 /s/ Jerome R. Bowen, Esq.
15 JEROME R. BOWEN, ESQ.
16 Nevada Bar No. 4540
17 9960 W. Cheyenne Ave., Suite 250
18 Las Vegas, Nevada 89129
19 Attorneys for Plaintiff

DATED this 9th day of January, 2025.

**MCCORMICK, BARSTOW, SHEPPARD,
WAYTE & CARRUTH LLP**

14 /s/ Mandy Vogel, Esq.
15 JONATHAN W. CARLSON, ESQ.
16 Nevada Bar No. 10536
17 Mandy Vogel, Esq.
18 Nevada Bar No. 16150

19 and
20 Cary B. Lerman, Esq. (Pro Hac Vice)
21 Joseph N. Glynn, Esq. (Pro Hac Vice)
22 J. Max Rosen, Esq. (Pro Hac Vice)
23 MUNGER, TOLLES & OLSON LLP
24 Attorneys for Defendant GEICO

22 IT IS SO ORDERED.

25 
26 UNITED STATES MAGISTRATE JUDGE

27 Dated: January 10, 2025